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DEPARTMENT OF
HEALTH AND ENVIRONMENTAL SCIENCES
Solid and Hazardous Waste Bureau
Hazardous Waste Program
(406) 444-1430

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1992

STAN STEPHENS, GOVERNOR

FAX #(406) 444-1499

STATE OF MONTANA

OFFICE 836 Front Street
LOCATION: Helena, Montana

MAILING Cogswell Building
ADDRESS: Helena, MT 59620

MEMORANDUM

TO: Interested Parties

FROM: Ken Reick *KR*

DATE: October 26, 1992

SUBJECT: NOTICE OF ISSUANCE OF A DRAFT STORAGE AND TREATMENT
PERMIT FOR SRM, INC. IN BUTTE, MTHWP-92-03

The Department has issued a draft version of a hazardous waste management permit for a commercial storage and treatment facility at the Special Resource Management (SRM) Rocker Intermediate Storage and Transfer Facility (RISTF), located six miles west of Butte. A public notice announcing this permit action appeared in the October 28, 1992 issue of the Montana Standard. A public meeting on the permit action will be held on Wednesday, December 9, 1992 at the Montana College of Mineral Science and Technology Student Union Building at 7:00 PM. Copies of the public notice, fact sheet and environmental assessment for this permit action are enclosed.

If you have any questions regarding this permit action, please contact me.

STATE DOCUMENTS COLLECTION

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HELENA, MONTANA 59620

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PUBLIC NOTICE

The Montana Department of Health and Environmental Sciences (MDHES) and the Environmental Protection Agency, Region VIII (EPA) intend to issue a hazardous waste management permit under Title 75, Chapter 10, Part 4 of the Montana Hazardous Waste and Underground Storage Act (MHWUSTA) and the Resource Conservation and Recovery Act (RCRA) to Special Resource Management, Inc. (SRM) for the construction and operation of a hazardous waste storage and treatment facility and for applicable provisions of the Hazardous and Solid Waste Amendments of 1984 (HSWA). The State of Montana is authorized to administer and enforce those portions of RCRA in effect prior to the enactment of HSWA. EPA retains the authority for HSWA amendments.

SRM, a subsidiary of Montana Power/Entech, has been operating a ten-day hazardous waste transfer facility at the Rocker Intermediate Storage and Transfer Facility (RISTF) since 1987. The RISTF is located approximately six miles west of Butte at the Interstate 90 Rocker Interchange. SRM submitted a RCRA Part B permit application to MDHES in December, 1989 for the construction and operation of a hazardous waste storage and treatment facility. MDHES considered the application to be incomplete. SRM submitted additional applications in August, 1990 and November, 1991. The MDHES considered the latest submittal to basically fulfill the RCRA Part B permitting requirements, however MDHES required additional information to be submitted in April and June, 1992. The MDHES now considers the application as complete and has issued a draft Part B permit for public review.

The purpose of this notice is to inform the members of the public that the draft permit is available for review and to seek their participation in the decision making process. Pursuant to the Administrative Rules of Montana (ARM) 16.44.905 and Section 7004(b) of RCRA and Title 40 Code of Federal Regulations Part 124.10, a forty-five day comment period, through December 14, 1992 will be afforded the public to submit written comments to the Department and EPA concerning the draft permit. The RCRA and HSWA draft permit will be available for examination at the following locations: Solid and Hazardous Waste Bureau, 836 Front Street, Helena, MT, between the hours of 8:00 AM and 5:00 PM, Monday through Friday, phone (406) 444-1430; and the Montana College of Mineral Science and Technology (Montana Tech) Library, Butte, MT, phone (406) 496-4281. A copy of the permit as well as all data submitted to EPA by SRM is also available for review at: U.S.EPA, Federal building, 301 S. Park, Helena, MT between the hours of 8:00 AM and 4:00 PM, Monday through Friday, phone (406) 449-5414. A fact sheet describing the facility and permit requirements and an environmental assessment are also available for review at the locations listed above.

A public meeting will be held on Wednesday, December 9, 1992 at 7:00 PM in the conference room of the Montana Tech student Union Building.

All written comments should be addressed to Ken Reick of the Solid and Hazardous Waste Bureau, Department of Health and Environmental Sciences, Cogswell Building, Helena, MT 59620, phone 444-1430; or Rosemary Rowe, Environmental Protection Agency, Federal Building, 301 S. Park Street, Helena, MT 59626, phone 449-5414

Interested persons may also call or write for additional information on the draft permit.

Dated the 26th day of October, 1992.

**FACT SHEET
FOR A HAZARDOUS WASTE MANAGEMENT FACILITY PERMIT
SPECIAL RESOURCE MANAGEMENT
ROCKER INTERMEDIATE TRANSFER AND STORAGE FACILITY
BUTTE, MONTANA
EPA ID. NO. MTD 981 547 672**

The Environmental Protection Agency, Region VIII (EPA) and the Montana Department of Health and Environmental Sciences (MDHES) intend to issue a hazardous waste management permit under Title 75, Chapter 10, Part 4 of the Montana Hazardous Waste and Underground Storage Tank Act (MHWUSTA) and the Resource Conservation and Recovery Act (RCRA) to Special Resources Management (SRM) for the operation of a commercial hazardous waste treatment and storage facility and for applicable provisions of the Hazardous and Solid Waste Amendments of 1984 (HSWA). The treatment and storage facility is known as the Rocker Intermediate Storage and Transfer Facility (RISTF) and is located approximately six miles west of Butte. The State of Montana is authorized to administer and enforce those portions of RCRA in effect prior to the enactment of HSWA. EPA retains authority for HSWA regulations. This fact sheet was prepared in accordance with the requirements of 40 Code of Federal Regulations (CFR) 124.8 and the Administrative Rules of Montana (ARM) 16.44.904.

PURPOSE OF THE PERMIT ISSUANCE PROCESS

The purpose of the permit issuance process is to allow MDHES, EPA, other governmental agencies, and interested citizens the opportunity to evaluate the ability of the Permittee to comply with the applicable requirements promulgated under RCRA, as amended by HSWA. The draft permit sets forth all applicable requirements with which the EPA and MDHES intend to require the Permittee to comply during the duration of the permit. The public is given forty-five (45) days to review and comment on the draft permit conditions prior to EPA and MDHES taking any final action on the draft permit.

FACILITY DESCRIPTION

Current Facility:

The RISTF is located in Silver Bow County, at the Interstate 90 Rocker Interchange. SRM, a subsidiary of Montana Power/Entech Company, has operated the RISTF since 1987. SRM is engaged in various hazardous waste management activities including remediation, characterization and transporting wastes from points of generation to out-of-state disposal facilities. The RISTF facility houses SRM corporate offices. It is a ten-day transfer facility where storage is allowed only

for that period of time. Very few hazardous waste management activities currently take place at the facility.

Proposed Facility:

SRM proposes to construct a hazardous waste storage and treatment facility at the RISTF location. The facility will consist of seven Container Storage Area's, a Loading/Unloading Area (LUA), a Fuel Blending Area (FBA), a "Safe Haven Area" and a Transfer Room. The CSA's are steel buildings constructed on concrete foundations with curbing. The FBA consists of a 5000 gallon tank with secondary containment. It will also be constructed on a concrete foundation. The "safe haven" area will be for bulk solids. The transfer room will be located in a garage. The "Safe Haven Area" will be a parking area for bulk loads of nonhazardous solid waste not subject to hazardous waste requirements. The facility will also have an analytical laboratory for performing analyses on waste materials.

HAZARDOUS WASTE ACTIVITIES

Hazardous wastes will be shipped to the facility by truck from points of generation in and around the state. The wastes will be in containers - usually 55 gallon drums. Upon arriving at the facility, the drums will be inspected and if they meet inspection criteria, will be unloaded and placed in the CSA's until they can be shipped to a suitable disposal facility. Wastes suitable for fuels will be blended in the 5000 gallon tank and eventually shipped by tanker truck to a disposal facility. Solidification of some liquid wastes may occur in the containers in which they are received at the facility. (Please see the accompanying Environmental assessment or the Draft Permit for a more detailed discussion on facility description and operation.)

Waste Materials to be Stored:

The following is an estimate of the types and quantities of wastes that will be managed at the RISTF. These materials are defined in 49 Code of Federal Regulations, Subchapter C, Part 173.

1) Flammable and combustible liquids	1,100 drums/yr
* 2) Reactives	60 drums/yr
3) Corrosive acids	180 drums/yr
4) Corrosive bases	200 drums/yr
5) Oxidizers	200 drums yr
6) Poisons A, B and Irritants	200 drums/yr
7) Non flammable compressed gas and ORM C,D,E	<u>280 drums/yr</u>

Estimated total 2,220 drums/yr

* Reactives include flammable solids, organic peroxides, and water reactives.

There will be a prohibition of the storage of explosive, radioactive and dioxin wastes.

PERMIT CONDITIONS

Essentially all activities directly dealing with the management of hazardous waste at the facility will be carried out under permit conditions. The Part B Permit will address items such as general facility standards, management of containers, and fuel blending and tank storage operations. (Please see the Draft Permit or the EA for a more detailed discussion of permit requirements).

CLOSURE OF THE STORAGE FACILITY

Under RCRA regulations a hazardous waste management unit must be closed in a manner that:

- 1) Minimizes the need for further maintenance, and
- 2) Controls, minimizes or eliminates to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

Upon closure of the facility, the draft permit calls for removal and shipment of all wastes to an EPA approved disposal facility. Equipment and buildings will be decontaminated for use elsewhere. Concrete foundations and underlying soils will be sampled and analyzed for hazardous waste constituents. If contamination is found, the materials will be shipped to a hazardous waste disposal facility. If no contamination is found the material will be disposed of as solid waste. The 5000 gallon tank will be decontaminated and cut into pieces suitable for salvage. If no contamination is left on site at closure, SRM will not be required to provide post-closure care.

The MDHES contact person for the draft permit is:

Kenneth Reick
Solid and Hazardous Waste Bureau
836 Front Street
Helena, MT 59620
(406) 444-1430

HAZARDOUS AND SOLID WASTE AMENDMENTS

CORRECTIVE ACTION

Background

One of the most important provisions of the Hazardous and Solid Waste Amendments of 1984 is the requirement for corrective action for continuing releases of hazardous waste or constituents from solid waste management units. This provision is established in Section 3004(u) of RCRA and can be found in regulations at 40 C.F.R. 264.101.

Congress established a requirement that permits must address environmental contamination. All permit applicants must now (a) identify all solid waste management units (SWMUs) at the facility, (b) identify any releases that have occurred or are occurring from those units, (c) take appropriate corrective action to clean up those releases and (d) demonstrate financial assurance for those corrective actions.

The basic standard for imposing corrective action at SRM is protection of human health and the environment. The EPA permit will address corrective action when there is or has been a probable release at the facility that poses a threat to human health and the environment. A substantial threat to human health and environment is assumed if there is a likelihood of a hazardous waste or hazardous constituent release from a solid waste management unit into the air, surface water, ground water, or soil.

Implementation

The HSWA permit requires SRM to do the following:

1. Notify the EPA if any solid waste management units are identified at the facility. Upon notification by the Director, prepare a workplan for investigating the solid waste management units at the facility. This workplan must outline tasks designed to determine the nature and extent of contaminant releases and the potential pathways along which contaminants may migrate.
2. Conduct site investigations according to the workplan.
3. Report to EPA on the results of the investigations.
4. Prepare a plan, conduct studies and report to EPA on corrective measures which may be needed to respond to releases identified at the facility.
5. Conduct interim measures, as necessary, to address any unit which poses a current threat, or potential threat, to human health or the environment.

If EPA finds that further studies and/or corrective measures are warranted, EPA will propose a permit modification and follow appropriate procedures which will include a public notice period and a public hearing, if requested.

Currently, no solid waste management units have been identified at SRM.

OTHER PROVISIONS

Four other HSWA provisions, in addition to those pertaining to corrective actions for continuing releases, apply to this permit.

Section 3005(h) of RCRA requires that Permittees of hazardous waste management facilities must certify that certain waste minimization practices have been established. This requirement has been incorporated into regulations at 40 C.F.R. 264.73(b) (9).

Sections 3004(d), (e), (f), (g), and (m) of RCRA prohibit the land disposal of hazardous wastes unless it has been demonstrated to EPA, to a reasonable degree of certainty, that there will be no migration of hazardous constituents from the disposal unit for as long as the wastes remain hazardous or the waste has first been treated to certain standards. These requirements have been incorporated into regulations at 40 C.F.R. 268.

Section 3004(n) of RCRA required EPA to develop regulations for the monitoring and control of air emissions at hazardous waste treatment, storage and disposal facilities. These regulations were promulgated on June 21, 1990 under 40 C.F.R. 264, Subparts AA and BB.

Sections 3001(g) and (h) of RCRA required EPA to examine and revise the Extraction Procedure toxicity characteristic (one of four existing characteristics used to identify those wastes defined as hazardous and subject to regulation). Accordingly, revisions to 40 C.F.R. Part 261.24 were promulgated on March 29, 1990. These revisions revised the test method, added 25 organic chemicals to the list of toxic constituents of concern, and established regulatory levels for these organic chemicals.

The EPA contact person for the SRM draft permit is:

Rosemary Rowe
U.S. Environmental Protection Agency
Montana Office
301 S. Park, Drawer 10096
Helena, MT 59626
(406) 449-5414

PROCEDURES FOR REACHING A FINAL DECISION

Section 16.44.905 of the Administrative Rules of Montana, section 7004(b) of RCRA and 40 CFR 124.10 require that the public be given forty-five (45) days to comment on each draft permit prepared under the Resource Conservation and Recovery Act. The comment period for the SRM permit will begin on October 28, 1992 and will end on December 14, 1992. Any person interested in commenting on this draft permit must do so within this 45 day period.

The draft permit will be available for review at the following locations: Solid and Hazardous Waste Bureau, 836 Front Street, Helena, phone (406) 444-1430, between the hours of 8:00 AM to 5:00 PM, Monday through Friday; Library of the Montana College of Mineral Science and Technology, Butte, MT. Also, a copy of the permit, as well as all data submitted to EPA by SRM, is available for review at: USEPA, Federal Building, 301 S. Park, Helena, between the hours of 8:00 AM and 4:00 PM, Monday through Friday, phone (406) 449-5414.

All persons wishing to comment on any of the permit conditions should submit their comments in writing to the Department of Health and Environmental Sciences, Solid and Hazardous Waste Bureau, Cogswell Building, Helena, MT 59601 or to the Environmental Protection Agency (EPA), Region VIII, Montana Office, 301 S. Park, Drawer 10096, Helena, MT 59626. Comments should include all reasonably available references, factual grounds and supporting material.

A public hearing will be held at the Student Union Building conference room at the Montana College of Mineral Science and Technology on December 9, 1992 at 7:00 PM to receive comments on the Draft permit.

When MDHES and EPA make a final decision to either issue, deny or modify the permit, notice will be given to the applicant and each person who submitted written comments or requested notice of the final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under 40 CFR 124.19 and/or ARM 16.44.911. If no comments are received requesting a change in this draft permit, the final permit shall become effective immediately upon issuance.

Comments and/or questions should be addressed to Kenneth Reick, Solid and Hazardous Waste Bureau, Cogswell Building, Helena, MT 59620, phone (406) 444-1430.

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES
Cogswell Building, Helena, Montana 59620
(406)444-2821

ENVIRONMENTAL ASSESSMENT (EA)

Division/Bureau:

Environmental Sciences Division/Solid and Hazardous Waste Bureau (SHWB)

Project or Application:

Special Resource Management, Inc. (SRM), a subsidiary of Montana Power/Entech Company, has submitted an application to obtain a permit that will allow the operation of a commercial hazardous waste storage, treatment and fuel blending facility. SRM is a subsidiary of Montana Power Company. The application has been prepared in accordance with the procedures specified in the Administrative Rules of Montana (ARM) Title 16, Chapter 44, Sub-Chapter 1. A draft permit has been prepared by the SHWB under the authority of the Montana Hazardous Waste and Underground Storage Tank Act Montana Code Annotated, Title 75, Chapter 10, Part 4.

The permit is referred to as a Resource Conservation and Recovery Act (RCRA) Part B Permit. The Resource Conservation and Recovery Act is the federal law under which regulations having to do with the Part B permitting process are implemented for hazardous waste treatment, storage or disposal facilities. Montana has adopted most of these regulations by reference. Montana has equivalent rules for all of the RCRA federal rules.

The proposed facility will be located approximately six miles west of Butte, MT near the Rocker Interchange on Interstate 90. The facility is called the Rocker Intermediate Storage and Transfer Facility (RISTF).

Description of Project:

General

The proposed facility will be a commercial facility for the temporary storage and handling of waste materials classified as hazardous under existing state and federal

regulations. The RISTF will receive wastes from clients (hazardous waste generators), store the wastes until they can be scheduled into a proper disposal facility and then ship the wastes to the disposal facility. No wastes will be disposed of on-site.

The RISTF will consist of a secure hazardous waste storage area, a loading/unloading area, a 5000 gallon bulk storage tank for the storage of blended wastes intended for a fuels program, a bulk transport "safe haven" area for bulk solids only, a garage with a transfer room, a laboratory for performing analytical work, decontamination facilities, and a building that houses SRM's corporate offices. The proposed RISTF is a new facility intended primarily for managing hazardous wastes produced by other generators. However, during the course of managing these wastes, SRM will also generate wastes that will have to be properly disposed of.

SRM operates a fleet of hazardous waste transportation equipment that is based at the RISTF. Storage of hazardous waste will be in framed steel buildings with monolithic concrete slabs and six-inch curbs for secondary containment. The buildings will be constructed in a secure fenced storage area.

Proposed Location

The facility will be located on a tract of land of approximately eleven acres situated in Silver Bow County in the NW1/4, SW1/4 of Section 16 T3N, R8W, M.P.M., also known as a portion of the Jessie Placer, Survey Number 8204. The land is leased by SRM from Dailey Petroleum Services Corporation of Conroe, Texas.

Hazardous Waste Treatment

Hazardous waste treatment may be conducted at the facility. This may include:

- Repacking of labpacks to meet the specifications of the disposal site and combining compatible labpacks into larger containers for storage and shipment.
- Blending of wastes suitable for use as fuels. These fuels will be manifested to a suitable TSDF for disposal or to an EPA approved end user.
- Solidification of incidental, in-drum wastes on a container by container basis to make the wastes easier to store, ship or prepare for disposal. The solidification process will take place in the drums in which the waste will be stored and shipped.

Facility Operation

Vehicles carrying hazardous waste for storage at the RISTF will be met at the main gate where the waste will be screened for acceptability. They will enter the RISTF secure area and proceed directly to the Loading/Unloading Area (LUA). The LUA is a framed steel building 25 feet wide by 50 feet long by 18 feet high. It is constructed on a six-inch thick monolithic concrete slab with a continuous six-inch high curb for secondary containment. The building will have four skylights and two overhead doors.

The vehicle will back up to the overhead door until its rear door is over the secondary containment curb. At this time, RISTF personnel will enter the truck and perform visual inspections of the load. If everything is in order, the containers will be unloaded using a forklift or bobcat. The drums will be staged inside the LUA building according to their contents. At this time sampling will be conducted for confirmation of contents and any discrepancies will be noted. Analyses will then be conducted on the samples and the load will be either accepted or rejected. If it is rejected, it will be reloaded onto the truck and returned to the generator. If it is accepted, the drums will be placed on self-contained pallets and transported to the proper Container Storage Area (CSA) or the Fuels Blending Area (FBA).

Container Storage Areas

Seven CSA's will be located at the facility. CSA's 1-6 will consist of one framed steel building for each area, with two ten-foot skylights and an eight-foot wide overhead door. The buildings are 20 feet wide by 35 feet long by 13 feet high and will be mounted on a six-inch high curb for secondary containment. Each building will have a capacity to store 120 containers (55 gallons ea.). The containers will be palletized, four to a pallet, and will be stacked two high. Pallets will be stored to allow for inspection, in two configurations: one provides for two-foot walkways on all four sides of an individual stack of pallets, and the second locates two stacks of pallets adjacent to each other with six-inches between them and two-foot walkways around all four sides of this group of two.

CSA 7 will be a single Butler steel building 20 feet wide by 39 feet long by 14 feet high, and will be mounted on a six-inch thick monolithic concrete slab with a continuous six-inch high curb for secondary containment. The building will have four bays 20 feet long. The bays will be separated by six-inch high concrete curbs and metal sheeting interior walls. The two center bays will be nine-feet wide and the two outer bays will be 10 1/2 feet wide. Each bay will have an eight-foot overhead door and can store up to 24 containers (55-gallon ea.). The containers will be palletized, four to a pallet, and stacked two high. The pallets will be positioned in a single row within the storage bays with a two-foot walkway around the perimeter of the pallets and a one-foot space between the pallets to allow for inspection.

The maximum design capacity of the CSA's is 3072 containers (55 gallon each) or 168,960 gallons.

Waste Categories

The general categories of wastes to be stored within the CSA's are:

- CSA 1 - Oxidizers
- CSA 2 - Poison A&B, Irritating Material, ORM-A
- CSA 3 - Non-flammable Gas, ORM-E, D, and C
- CSA 4 - Corrosive Bases
- CSA 5 - Flammable and Combustible Liquids
- CSA 6 - Corrosive Acids
- CSA 7 - Reactives: a) Flammable solids
 - b) Organic Peroxides
 - c) Water Reactives
 - d) Other special wastes requiring separation

These materials are defined in Department of Transportation rules, 49 Code of Federal Regulations, Subchapter C, Part 173.

Waste Volumes

SRM expects to manage approximately 2220 drums per year of hazardous waste after construction of the proposed facility. Approximately 70% of the waste expected to be received at the facility will be generated in Montana. At this time, all of the waste stored at the facility will be shipped out of state for final disposal.

Prohibited Wastes

Certain categories of wastes will be prohibited from storage at the facility. These are wastes consisting of, or containing:

- 1) Radioactive material as defined by 49 CFR 173.403(y),
- 2) Explosives identified as Division 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6 as identified by 49 CFR 173 Subpart C, and
- 3) Dioxins identified by the hazardous waste designations F020, F021, F022, F023, F026, F027 and F028.

Transfer Room

The Transfer Room will be separate from the LUA. It will be located in a corner of a garage at the facility. It will be equipped with an eighteen-foot overhead door and loading dock for unloading semi-trailers and other trucks. The room will have a valved floor drain which will drain to containers that will be used to collect any material spilled on the floor. It will also be equipped with safety equipment and can be used for labpack repacking, solidification, sampling and other uses.

Fuels Blending Area

The FBA consists of a dike tank, loading platform and transport loadout area. The entire FBA will be covered with a wood framed, metal roofed and sided, pole-barn type building enclosed on the west and north sides and open on the east and south sides. The tank and ancillary equipment are all above ground and have a storage capacity of 5,000 gallons.

The tank area is surrounded by a twenty-one inch high concrete curb which will provide 100% tertiary containment for the maximum capacity of the tank. The curbed area has a sloped floor and a sump.

The tank is a steel, dike tank. The dike is a separate steel containment vessel around the tank and provides 100% secondary containment .

Containers of liquid wastes suitable for fuels blending will be placed on self-contained pallets at the LUA and transported by forklift truck to the loading platform of the FBA, four containers at a time. The contents of the containers will be pumped into the storage tank. When the tank is full, its contents will be pumped into a transport tanker for transport to an appropriate TSDF. Transfer of wastes into the tanker will take place on a curbed, sloped loading pad with a sump.

Benefits and Purpose of Proposal:

The purpose of this proposal is to provide SRM with a RCRA Part B Permit that will allow for the construction of a facility to store hazardous waste for periods of up to a year prior to being shipped out of state for disposal.

SRM currently operates a hazardous waste transfer facility at the proposed RISTF location. Under Montana rules (ARM 16.44.500, et.al) SRM can store hazardous wastes at the facility for a maximum of ten days. Regulatory requirements for a ten-day transfer facility are limited to personnel training, security, emergency preparedness, container handling procedures and reporting.

The RCRA Part B Permit will establish regulatory control over all aspects of the facility that directly deal with the management of hazardous waste. (See the discussion below for more information on permit controls). As a permitted facility, SRM will also be subject to the extensive regulatory requirements of 40 CFR 264 as they relate to the facility.

Montana hazardous waste generators must ship all of their wastes out of state because there are no disposal facilities in the state. These generators must operate under state hazardous waste regulations which place limitations on the amount of time the wastes may remain at the point of generation. Some generators have experienced difficulty in meeting these limitations because of the logistics involved in getting the wastes removed from the site and shipped out of state. The proposed facility will help some generators meet these regulatory time frames.

Description and analysis of reasonable alternatives whenever alternatives are reasonably available and prudent to consider:

The only alternative to granting the RCRA Part B Permit is to not grant the Permit. This is not considered a reasonable alternative. The Department has concluded that the Part B Application submitted by SRM is complete. Having submitted a complete Part B Application, SRM has fulfilled all of the requirements in the permitting process as specified in ARM 16.44.100, et.al.

At this time, prior to evaluation of public comment, SHWB intends to grant the RCRA Part B Permit.

A listing and appropriate evaluation of mitigation, stipulations and other controls enforceable by the agency or another government agency:

Operation of the proposed facility must meet applicable requirements of the Montana Hazardous Waste and Underground Storage Act and the RCRA Part B Permit conditions. The RCRA Part B Permit will place practically all aspects of the facility directly managing hazardous wastes under regulatory control. The permit addresses items such as:

- Design and construction of facility components
- General waste analyses
- Security
- Inspection requirements
- Personnel training
- Preparedness and prevention
- Contingency plan
- Recordkeeping and reporting
- Manifest system
- Closure requirements

Financial assurance for facility closure
Liability requirements

Also included in the Permit are requirements for operation of the Container Storage Areas and Fuel Blending Area.

The facility will be inspected on at least an annual basis by MDHES personnel. The purpose of the inspections will be to determine whether the facility is being operated in accordance with Permit conditions and applicable regulatory requirements.

Following issuance of the Permit, should SRM wish to change any aspect of the facility that is operated under Permit conditions (e.g. construction of additional storage capacity), it must go through the permit modification procedures contained in ARM 16.44.116. If the modifications are deemed major by MDHES, the MEPA process will be followed for determining whether an environmental review is required, and the modification(s) will be made available for public review and comment as required by ARM 16.44.901 et.al.

Recommendation:

The recommendation of MDHES is to request public comment on the Draft RCRA Part B Permit.

If an EIS is needed, and if appropriate, explain the reasons for preparing the EA:

An EIS is not needed.

If an EIS is not required, explain why the EA is an appropriate level of analysis:

Through the permitting process, MDHES has analyzed the impact of the proposed action in regard to level of scope and magnitude. Based on the complexity of the proposed action, the environmental sensitivity of the area in which the proposed action will take place, the degree of uncertainty that the proposed action will cause significant impacts and the need for the complexity of mitigation measures required to avoid significant impacts, MDHES has concluded that the EA is the appropriate level of environmental review. To wit:

Facility operations will consist of storage, treatment and blending of hazardous wastes shipped to the facility from off-site generators. No disposal of hazardous wastes at the facility will occur. All waste handling operations will be conducted on concrete lined surfaces (which will have been sealed with a chemical resistant compound) with curbs to ensure that wastes will not come into contact with the ground.

All buildings in which waste management will occur are covered, thereby preventing precipitation from coming into contact with waste materials. The buildings are designed such that run-on in the form of precipitation cannot enter them.

The facility is located outside of the hundred-year flood plain. No discharges to surface water or ground water will occur.

A commercial hazardous waste transfer facility exists and is in operation at the site of the proposed action. The effect of the proposed action will be to construct buildings for the storage of waste materials currently being managed at the facility. Native soils have already been removed and replaced with gravel or asphalt. No species of wildlife or plant life other than common weeds have been observed at the location. No buildings or structures of historical interest are at the location.

A Preparedness and Prevention Plan is included in the Draft Part B Permit. The Plan ensures that the facility is designed, constructed and operated in a manner that minimizes the possibility of a fire, explosion or unplanned release of hazardous wastes to the environment.

Also included in the Draft Permit is a Contingency Plan for dealing with emergency situations. The Plan contains specific responses to be taken in the event of a fire, explosion or unplanned release of waste material. Also included are evacuation procedures, and agreements and notifications made with local emergency response organizations such as fire departments, police departments and hospitals.

Upon closure of the facility, all hazardous wastes, waste residues and contaminated materials will be removed and shipped to appropriate disposal facilities. Buildings and equipment will be cleaned and shipped elsewhere for further use. Residues from the cleaning process will be containerized and shipped to an appropriate disposal facility. The ground underneath the buildings used for hazardous waste management will be sampled for waste and waste constituents. If the sampling indicates that a release to the soils has occurred, the extent of contamination will be determined and all contaminated soils will be removed and shipped to an appropriate disposal facility. The removed soils will be replaced with clean soils which will have been tested prior to being emplaced.

Based on the above, the SHWB has concluded that issuance of a RCRA Part B Permit will not result in any significant impact to the environment and therefore the EA is the appropriate level of analysis.

Other groups or agencies contacted or which may have overlapping jurisdiction:

Environmental Protection Agency

Individuals or groups contributing to this EA:

SRM

EA prepared by:

Kenneth G. Reick

Date: October 20, 1992

POTENTIAL IMPACT ON PHYSICAL ENVIRONMENT

MAJOR MODERATE MINOR NONE UNKNOWN ATTACHED

1. TERRESTRIAL AND AQUATIC LIFE AND HABITATS
2. WATER QUALITY, QUANTITY AND DISTRIBUTION
3. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE
4. VEGETATION COVER, QUANTITY AND QUALITY
5. AESTHETICS
6. AIR QUALITY
7. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENV. RESOURCES
8. DEMANDS ON ENV. RESOURCES OF WATER, AIR AND ENERGY
9. HISTORICAL AND ARCHAEOLOGICAL SITES

1.			XX		
2.			XX		
3.			XX		
4.			XX		
5.		XX			
6.			XX		
7.			XX		
8.			XX		
9.			XX		

CUMULATIVE AND SECONDARY IMPACTS: None

POTENTIAL IMPACT ON HUMAN ENVIRONMENT

MAJOR MODERATE MINOR NONE UNKNOWN ATTACHED

1. SOCIAL STRUCTURES AND MORES
2. CULTURAL UNIQUENESS AND DIVERSITY
3. LOCAL AND STATE TAX BASE AND TAX REVENUE
4. AGRICULTURAL OR INDUSTRIAL PRODUCTION
5. HUMAN HEALTH
6. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES
7. QUANTITY AND DISTRIBUTION OF EMPLOYMENT
8. DISTRIBUTION OF POPULATION
9. DEMANDS FOR GOVERNMENTAL SERVICES
10. INDUSTRIAL AND COMMERCIAL ACTIVITY
11. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS

1.			XX		
2.			XX		
3.		XX			
4.			XX		
5.			XX		
6.			XX		
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8.			XX		
9.		XX			
10.		XX			
11.			XX		

CUMULATIVE AND SECONDARY IMPACTS: None

DISCUSSION OF POTENTIAL IMPACT OF PROPOSED FACILITY

Potential Impact on Physical Environment

5. Aesthetics:

Impact of the proposed facility on the aesthetics of the area is considered minimal. An office building housing the Transfer Room and garage, an unused gasoline house previously used for housing fuel facilities and a modular office trailer are already present at the location. A truck stop and restaurant, and a motel are located within a quarter mile west of the facility. Therefore the location and its immediate surroundings are presently used for highly visible commercial activities.

The proposed facility requires the addition of seven container storage buildings, a loading/unloading building, a 5000 gallon tank and various ancillary structures such as walkways, ramps and fences (see the above description of the facility for details on these structures). The facility will be located adjacent to and north of Interstate 90 and just west of the Brown's Gulch road. All structures will be highly visible from these view points. Some of the structures will also be visible from the town of Rocker which is located approximately one-half mile on the opposite side (south) of Interstate 90 and several small farms located within several miles of the location.

Impact of the facility operation on aesthetics is also considered minimal. All containers will be stored inside the CSA's. Truck traffic to the facility will increase slightly (see 10. below) over the volume that currently exists on Interstate 90 and on the portion of the Interstate exit and the Brown's Gulch Road that the trucks will have to travel in order to enter the facility. The trucks will leave the facility as soon as they have been unloaded.

Potential Impact on the Human Environment

3. Local and state tax base and tax revenue:

Impact of the proposed facility on tax bases and revenue is considered minimal. It is expected that operation of the facility will result in an increase in revenues of from 10% to 20% over those now being realized by SRM.

7. Quantity and distribution of employment:

The impact of the proposed facility on the quantity and distribution of employment in Butte - Silver Bow will be minimal. Construction of the facility will create from three to nine temporary jobs for a period of approximately three months. Operation of the facility will create 4.5 additional full time positions.

9. Demands for governmental services:

The impact of the proposed facility on demands for governmental services is considered minimal. The ten-day transfer facility is currently inspected by MDHES personnel on an annual basis. Frequency of inspections of the proposed facility may increase during the first year of operation but will likely be returned to an annual frequency. Inspections by EPA personnel usually coincide with MDHES inspections. In the event of an emergency at the facility, local fire departments, hospitals and police departments may be involved. Demands on services of other state, federal or local agencies are not expected.

10. Industrial and commercial activity:

There is currently very little activity at the facility in the form of hazardous waste management. A minimal amount of waste is stored at RISTF. Commercial traffic at the facility is also minimal.

The primary form of industrial and commercial activity at the proposed facility will be in the form of truck traffic entering and leaving the facility, movement of containers from the trucks to CSA's, transferring liquid hazardous waste from containers into the FBA and transferring this waste from the FBA into transport vehicles for shipment to off-site disposal facilities. Operation of the proposed facility will significantly increase the amount of industrial and commercial activity relative to the current situation at the facility.

This increase is considered minimal relative to the amount of industrial and commercial traffic occurring in the immediate vicinity of the facility. Trucks entering and leaving the proposed facility will use Interstate 90 and associated exit and entrance ramps, and a short portion (approximately 400 feet) of the Brown's Gulch Road. The number of trucks currently entering and leaving the facility is one or two weekly. Once the facility begins operation one truck per day is expected to be arriving. This is an insignificant increase in traffic in the area.



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W.O.			
NEW DRAWING			

LEGEND

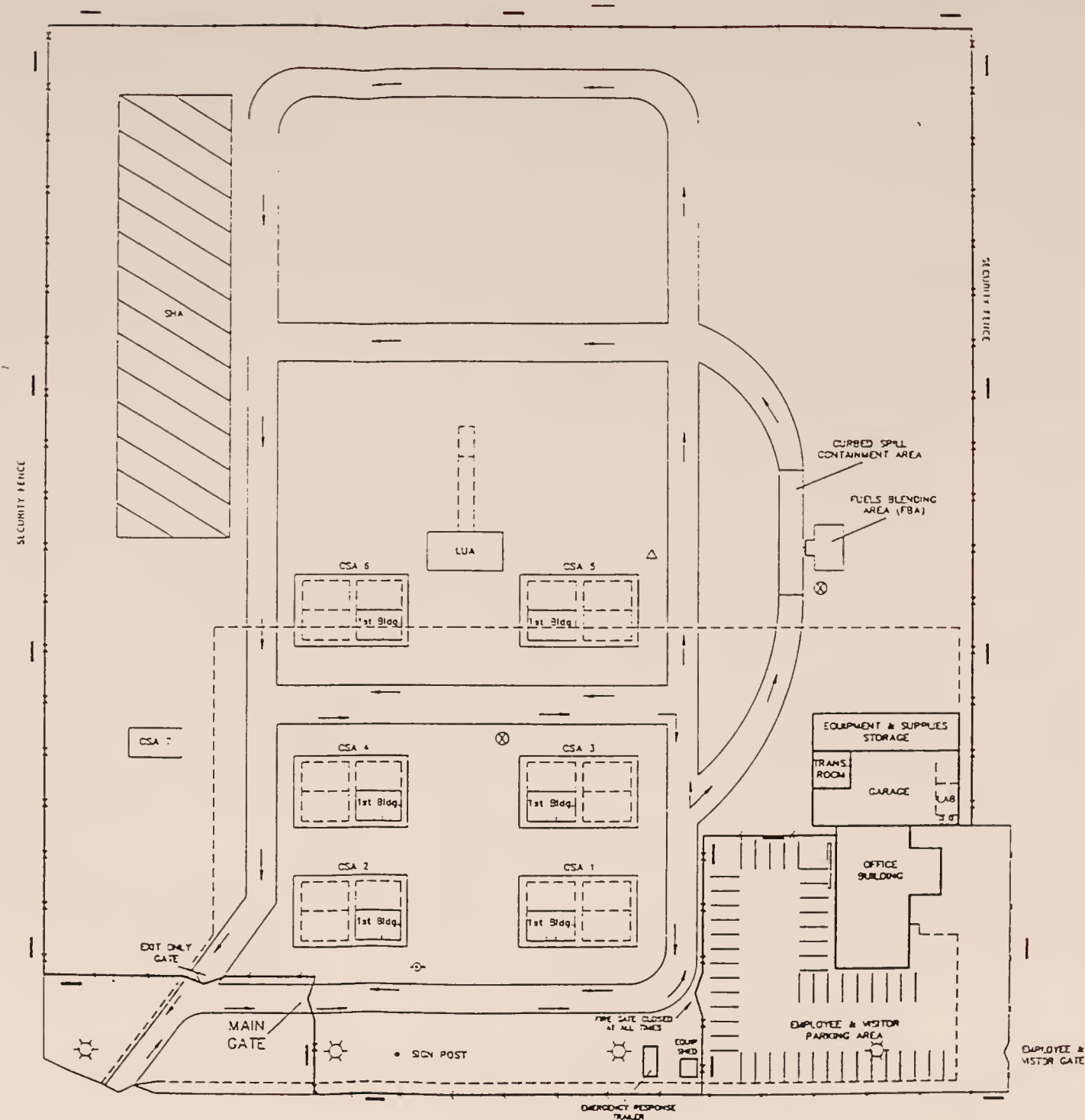
(Symptoms not to score)

- | | |
|---|-----------------------------------|
|  | FENCE |
|  | LIGHT POLE |
|  | PERIMETER OF PAVEMENT |
|  | WARNING SIGNS |
|  | FIRE HYDRANT |
|  | SIREN |
| | PULL STATION |
|  | 350# WHEELED
FIRE EXTINGUISHER |

LOADING & UNLOADING AREA (LUA) (25x50 CONCRETE PAD)
CONTAINER STORAGE AREAS (CSA)

- CSA 1 OXIDIZERS
CSA 2 POISON A&B, ORM-A, IRRITATING MATERIALS
CSA 3 NON-FLAMMABLE GAS, ORM-E,D,C,
CSA 4 CORROSIVE BASES
CSA 5 FLAMMABLE COMBUSTIBLE LIQUIDS
CSA 6 CORROSIVE ACID
CSA 7 REACTIVES
A) FLAMMABLE SOLIDS
B) ORGANIC PEROXIDES
C) WATER REACTIVES
D) OTHER SPECIAL WASTES REQUIRING SEPARATING

FUELS BLENDING AREA (FBA)
SAFE HAVEN AREA (SHA)



REFERENCE DRAWINGS



Special
Resource
Management, Inc.

RISTF SITE MAP

DRAWN	DESIGNED	APPROVE
J. BENNIE	IC. GREENE	
SCALE	FOOTING	NO. SIZE
		C

